

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

GOVERNMENT'S ASSENTED-TO MOTION TO EXCLUDE THE TIME
FROM MARCH 10, 2005 THROUGH MAY 31, 2005,
AND FOR AN ORDER ON EXCLUDABLE DELAY

The United States hereby moves move, pursuant to 18 U.S.C. §3161(h)(8)(A) and Section 5(c)(1)(A) of the Plan for the Prompt Disposition of Criminal Cases of the United States District Court for the District of Massachusetts, to exclude the time within which trial must commence under 18 U.S.C. §3161(c)(1), excluding from such computation all time, commencing on March 10, 2005 (date of arraignment), and concluding on May 31, 2005(date of interim status conference).

As grounds therefor, the undersigned states that the parties have sought, and the Court has granted this day, additional time to complete discovery under the Local Rules up to and including May 31, 2005.

WHEREFORE, the parties respectfully request, under 18 U.S.C. §3161(h)(8)(A) and §5(c)(1)(A) of Plan for Prompt Disposition of Criminal Cases of this Court, that this Court find, based on the above, that the ends of justice are served by granting the requested exclusion, and that said exclusion outweighs the best

interest of the public and the defendants in a speedy trial, and, accordingly, exclude all time, **commencing on March 10, 2005, and concluding on May 31, 2005**, in computing the time within which trial must commence under 18 U.S.C. §3161, and request that the Court enter an Order of Excludable Delay.

Counsel for the defendant, Jessica Hedges, Esq., for Stephen Hrones, Esq., assented to this motion in open Court during the Initial Status Conference held this day.

MICHAEL J. SULLIVAN
United States Attorney
By:

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney
(617) 748-3103

Dated: April 22, 2005

CERTIFICATE OF SERVICE

This is to certify that I have this day served upon the person listed below a copy of the foregoing document electronic court filing and/or regular mail:

Stephen Hrones, Esq.
Jessica Hedges, Esq.
Hrones, Garrity & Hedges, LLP
Lewis Wharf - Bay 232
Boston, MA 02109

This 22nd day of April, 2005.

/s/Antoinette E.M. Leoney
ANTOINETTE E.M. LEONEY
Assistant U.S. Attorney